

Daniel S. Szalkiewicz, Esq. (DS2323)
DANIEL SZALKIEWICZ & ASSOCIATES, P.C.
23 WEST 73RD STREET
SUITE 102
NEW YORK, NEW YORK 10023
Attorneys for the Plaintiff C.V.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

C.V.

Plaintiff,

v.

LAUREN CARMINUCCI a/k/a LAUREN GENSINGER,

Defendant.

DECLARATION OF C.V.

I, C.V., being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request to proceed under the pseudonym “C.V.”

2. I request the court permit me to bring this case as “C.V.” for several reasons.

3. From approximately 2018 to 2023, I was a part of a group chat of four women, including defendant LAUREN CARMINUCCI a/k/a LAUREN GENSINGER (“Carminucci” or “Defendant”).

4. I was introduced to Defendant and another woman in the group, N.K. through my friend O.S. As friends of friends, we all had a lot in common and grew closer the more we shared with one another.

5. The topics discussed in the group chat varied by the day, however, broadly speaking, the four of us discussed our marriages, families, health, aspirations, and goals plus other topical observations.

6. As adult relationships are not always the easiest to cultivate, I considered myself lucky to have this small group of women who served as a much-needed board of advisors when times were tough and a welcome source of entertainment during the lockdown and beyond.

7. In late 2022 through early 2023, I was going through a difficult time in my marriage and experiencing unhappiness with my body following pregnancy. Among other steps I took to address my emotional and physical health, I made the decision to get a breast augmentation.

8. I spent months researching the different methods and best doctors to perform this procedure, often querying this group of women as to whether they had heard of a specific surgeon or had any first or secondhand knowledge about the many ways breast augmentation can be performed.

9. Because Defendant had also undergone a breast augmentation procedure, she had already done much of the research I was now doing and frequently weighed into the conversation. Defendant offered what I then believed to be invaluable insight into the process and her own successful experience greatly eased my anxieties about undergoing an elective procedure.

10. In April, 2023, I underwent the procedure.

11. Several weeks later, excited by my results and also looking for Defendant's opinion on my healing progress as compared with hers, I sent an image of my breasts to Defendant and one other close friend in the group chat.

12. Importantly, I did not send the image to the group at large because I was not as close with N.K. as I was with O.S. and Defendant.

13. While Defendant Carminucci was complimentary to me, she began sending the image with other people we both knew.

14. I am in possession of one such text sent by Defendant Carminucci in which she stated “Did she sent you her boobs” and then, before waiting for an answer, sent the image of my exposed breasts. Below the image, she wrote “Mine are circles. Idk what’s wrong in the middle there. But maybe bc she just did them” then repeated “The middle...Mine are perfect circles...All around...Like perfect circles...Idk why the middle is like that[.]”

15. Defendant was well aware I had not been sending the image around en masse or should have been, considering the limited members of the conversation in which I shared the image.

16. I confronted Defendant Carminucci about her sending my image to people as well as making other false statements about my family and me.

17. More specifically, Defendant Carminucci had been telling acquaintances that my husband “fucked” prostitutes.

18. Defendant Carminucci minimized my distress, saying “[god] forbid lauren from New Jersey said he fucked” prostitutes.”

19. Later she wrote “Okay so I made it up and tooo it out of context. Are we done here...I talked to [O.S.] and [N.K.] about it. Your friends, too. And who else?” She claimed that I was wasting her time being upset about it.

20. Defendant’s behavior has been deeply upsetting.

21. Aside from the loss of Defendant as a friend and confidante, Defendant Carminucci has also caused me to distance myself from mutual acquaintances with whom I have reason to believe she shared the image and/or claims. Her conduct further makes me question the goodness of all my friends and whether it's ever safe to confide in or trust people.

22. The picture I sent was, of course, deeply personal.

23. Most obviously it showed my bare breasts, still healing from a surgical procedure. But that procedure was also borne from the physical insecurities I had been experiencing and sharing with the group. I had shared it with Defendant and O.S. because for the first time in a long time I felt good. And what Defendant did was share it with a bunch of people with her own critiques, which made me feel awful.

24. Now, nearly a year later, my physical scars have healed, and my marital problems are working themselves out, but what hasn't gone away is that feeling of violation that was caused by Defendant Carminucci.

25. If there is anything that I have learned over the course of the past several years it is that mental health is important and if it's not proactively being guarded, one bad actor can destroy it.

26. I do not want this docket to become a weapon which Defendant Carminucci can use to continue to make allegations about my husband's sexual preferences, broadcast my insecurities, or share my intimate image or even an edited version of it with the world.

27. If forced to proceed using my true name and simply trust that Defendant Carminucci will do the right thing and keep her arguments legal in nature, I likely would not bring this lawsuit at all.

28. I request that the court allow me to utilize my initials in this action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 7, 2024

